

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF ARIZONA

IN RE BARD IVC FILTERS
PRODUCTS LIABILITY LITIGATION

No. MD-15-02641-PHX-DGC

**MOTION FOR SUBSTITUTION OF
PARTY**

This Document Relates to:

Plaintiff: Eileen Shea
Case: 2:16-cv-03088-DGC

Counsel, pursuant to Rule 25(a)(1) of the Federal Rules of Civil Procedure, hereby moves this Court for an order substituting Kathleen A. Shea, as executor and representative of the Estate of Eileen Shea, for the named Plaintiff in this case. As grounds therefore, counsel states as follows:

1. That Eileen Shea filed a products liability action on September 14, 2016.
2. That on or about August 20, 2018, Eileen Shea passed away.
3. That Kathleen A. Shea was appointed as Executor of the Estate of Eileen Shea on October 16, 2018 (see letters testamentary, attached as Exhibit 1).
4. That pursuant to Fed. R. Civ. P. 25(a)(1), the Court may order substitution of the proper parties upon a motion by any party or by the representatives of the deceased party.
5. That a proposed amended SFC reflecting the requested substitution is attached hereto as Exhibit 2.

WHEREFORE, Kathleen A. Shea, as representative and executor of the Estate of Eileen Shea, deceased, respectfully requests this Court grant her motion for Substitution of Party. A proposed order is attached hereto.

RESPECTFULLY SUBMITTED this 19th day of April, 2019.

SHRADER & ASSOCIATES, L.L.P.

By: /s/ A. Layne Stackhouse

A. Layne Stackhouse

3900 Essex Lane, Suite 390

Houston, TX 77027

T: (713) 782-0000

F: (713) 571-9605

layne@shraderlaw.com

Attorney for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on this 19th day of April, 2019, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing.

/s/A. Layne Stackhouse